

REMARKS

Claim 16 stands rejected under 35. U.S.C. §112, second paragraph as not being sufficiently definite. Claims 1-2, 8 and 12-18 stand rejected as being anticipated by U.S. patent application publication No. 2002/0095305 (hereinafter Gakidis). Claims 3-7, 9-11 and 19 stand rejected under 35. U.S.C. §103(a) as being unpatentable over Gakidis. Reconsideration of the rejections and allowance of all the pending claims is respectfully requested in view of the foregoing amendments and the following remarks.

Independent claims 1, and 16 have been amended. Claims 3 and 4 have been cancelled. Accordingly claims 1, 2, 4-19 remain pending.

In connection with the §112, second paragraph issue noted in the Office Communication, the word "sites" has been deleted. Consequently, this rejection has been overcome.

Independent claims 1, and 16 have been amended to highlight aspects of the present invention not disclosed or suggested by the applied prior art. Claim 1 is directed to a method of managing an idea management system and providing the idea management system to a first business organization (i.e., a customer) wherein a second business organization independent from the first business organization is a service provider with respect to the customer. The idea management system is developed by the service provider but is managed by the customer. The service provider is a recipient of ideas submitted by employees of the customer into the idea management system to improve a product or service purveyed by the service provider to at least the customer. The method includes stimulating a flow of ideas from the customer through a remuneration or reward provided by the service provider to employees of the customer for ideas submitted into the idea management system. The method further includes compensating by the service provider the customer for commercializing ideas submitted into the idea management system by the employees of the customer. A multimedia presentation is generated by the idea management system to convey an animated graphical presentation of one or more scenarios resulting from ideas submitted by the customer to improve the product or service purveyed by the service provider. The multimedia presentation is used for evaluating the submitted ideas.

It is respectfully submitted that Gakidis fails to teach or suggest each of the recited operational and/or structural relationships recited in claim 1. For example, it is felt that Gakidis fails to describe or suggest an idea management system developed by the service provider but actually managed by the customer. Moreover, it is felt that Gakidis fails to describe or suggest

stimulating a flow of ideas from the customer through a remuneration or a reward provided by the service provider to employees of the customer for ideas submitted into the idea management system. One example provided by Gadiki refers to Venture Capitalists (VCs). There is no incentive in Gadiki to develop an idea management system as set forth in the claimed invention since the VCs do not have any reason to remunerate or reward the people seeking funding from the VCs. Another example provided by Gadiki refers to an idea management system within a given organization to collect ideas submitted by the employees of that organization. In this scenario, there is no mention whatsoever in Gadiki of remunerating or rewarding non-employees of the given organization to enhance the flow of ideas as set forth in the claimed invention. Also Gakidis fails to describe or suggest generating a multimedia presentation by the idea management system to convey an animated graphical presentation of one or more scenarios resulting from ideas submitted by the customer to improve the product or service purveyed by the service provider. The multimedia presentation is used for evaluating the submitted ideas. Since Gakidis fails to teach or suggest each of the recited operational and/or structural relationships recited in claim 1, Gadiki fails to constitute an appropriate *prima facie* reference for anticipating or otherwise rendering unpatentable claim 1 and any claims depending there from. Consequently, grounds of rejection of such claims either under §102 or under §103 should be withdrawn.

Claim 16 is directed to a computer system for remote supporting and operating an idea management system. In view of the foregoing discussion, it is respectfully submitted that Gadiki also fails to constitute a *prima facie* reference for sustaining either a §102 or a §103 rejection of independent claim 16 and any claims depending there from.

Conclusion

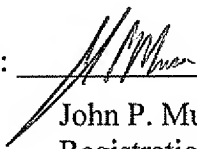
It is respectfully submitted that each of the claims pending in this application recites patentable subject matter, and it is further submitted that such claims comply with all statutory requirements and thus each of such claims should be allowed.

The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper, including the fees specified in 37 C.F.R. §§ 1.16 (c), 1.17(a)(1) and 1.20(d), or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

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